

ASJZ/SD/DG 2024R00565

SEALED

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

BRANDON SCOTT GLISSON,

Defendant

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CRIMINAL NO. JRR 24-0300
**(Bribery, 18 U.S.C. § 201(b)(1)
Forfeiture, 18 U.S.C. § 982(a)(3)(C);
18 U.S.C. § 981(a)(1)(C); 28 U.S.C.
§ 2461(c); 21 U.S.C. § 853(p))**

INFORMATION

COUNT ONE

(Bribery)

The United States Attorney for the District of Maryland, charges that:

At all times relevant to this Information:

1. Defendant **BRANDON SCOTT GLISSON** was a government contractor who worked onsite at Agency 1, which is located in Virginia.

2. Public Official 1 (“PO-1”) was a resident of Maryland and a public official at Agency 1 within the meaning of 18 U.S.C. § 201. As part of his official duties, PO-1 identified and recommended information technology solutions for Agency 1 based on the best interests of Federal Agency 1 and free from conflicts of interest. PO-1 had regular access to procurement information and had influence in Agency 1’s procurement process, including by influencing whether Agency 1 purchased various products, as well as when and how much of a product Agency 1 purchased.

3. Company 1 was a cloud data management and data security company headquartered in Palo Alto, California. Company 1 sold hardware and software solutions to government agencies, including Agency 1.

4. Director 1 was a Maryland resident and the Director of Intelligence and Special Access Programs for Company 1.

5. On or about August 19, 2019, and continuing until at least on or about October 8, 2020, in the District of Maryland and elsewhere, the Defendant,

BRANDON SCOTT GLISSON,

did directly and indirectly, corruptly give, offer, and promise a thing of value to PO-1 with the intent to influence an official act, and with the intent to induce PO-1 to violate his lawful duty, and to influence PO-1 to commit, aid in committing, and collude in and allow, a fraud and make opportunity for the commission of a fraud on the United States; that is, **GLISSON** and Director 1 directly and indirectly gave \$630,000 in United States currency to PO-1: (A) to influence PO-1 to undertake official acts related to procurements of Company 1 products and services; (B) to influence PO-1 to commit, aid in committing, collude in, allow, and make opportunities for the commission of fraud on Agency 1; and (C) to induce PO-1 to do or omit to do an act in violation of his lawful duty of assisting in the procurement of goods and services in a manner free from conflicts of interest.

18 U.S.C. § 201(b)(1)

FORFEITURE ALLEGATION

The United States Attorney for the District of Maryland, further finds that:

1. Pursuant to Fed. R. Crim. P. 32.2, notice is hereby given to the Defendant that the United States will seek forfeiture as a part of any sentence in accordance with 18 U.S.C. §§ 981(a)(1)(C) and 982, 21 U.S.C. § 853(p), and 28 U.S.C. § 2461(c), in the event of Defendant's conviction under Count One of this Information.

Bribery Forfeiture

2. Upon conviction of the offense alleged in Count One of this Information, the Defendant,

BRANDON SCOTT GLISSON,

shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(2), any property constituting, or derived from, proceeds obtained directly or indirectly, as the result of such offense.

Substitute Assets

3. If, as a result of any act or omission of the Defendant, any of the property described above as being subject to forfeiture:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be divided without difficulty;

the United States shall be entitled to forfeiture of substitute property up to the value of the forfeitable property described above pursuant to 21 U.S.C. § 853(p), as incorporated by 21 U.S.C. § 982(b)(1) and 28 U.S.C. § 2461(c).

18 U.S.C. § 981(a)(1)(C)

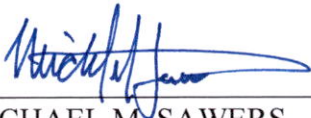
18 U.S.C. § 982(a)(2)

21 U.S.C. § 853(p)

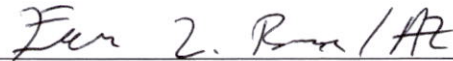
28 U.S.C. § 2461(c)

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